

EXHIBIT A

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ABBY LINEBERRY and MIGUEL
CORDERO, individually and on behalf of all
others similarly situated,

Plaintiffs,

vs.

ADDSHOPPERS, INC., and PEET'S
COFFEE, INC.,

Defendants.

Case No. 3:23-cv-01996-VC

[PROPOSED] VERDICT FORM

We, the jury in the above-entitled action, find as follows:

1. Did AddShoppers willfully collect, capture, or otherwise obtain the contents of Plaintiffs' and the Class's communications while those communications were being sent or received in California?¹

Yes_____ No_____

If you answered "Yes" to Question 1, please proceed to Question 2. If you answered "No" to Question 1, your deliberations are concluded.

2. Did AddShoppers obtain Plaintiffs' and the Class's consent before collecting, capturing, or otherwise obtaining their communications?²

Yes_____ No_____

¹ See *Bultemeyer*, Question 3; *Ramirez*, Questions 1-3.

² See *Bultemeyer*, Question 2.

If you answered “No” to Question 2, please proceed to Question 3. If you answered “Yes” to Question 2, your deliberations are concluded.

3. Did Peet’s Coffee knowingly provide substantial assistance and encouragement to AddShoppers in collecting, capturing, or otherwise obtaining Plaintiff Cordero’s and the Class’s communications on the Peet’s Coffee website?

Yes_____ No_____

If you answered “Yes” to Question 3, please proceed to Question 4. If you answered “No” to Question 3, proceed to Question 5.

4. Did Peet’s Coffee obtain Plaintiff Cordero and the Class’s consent through the Peet’s Coffee website before AddShoppers collected, captured, or otherwise obtained their communications?

Yes_____ No_____

Please proceed to Question 5.

5. Before April 24, 2022, did Plaintiffs or the Class discover AddShoppers collected, captured, or otherwise obtained their communications?

Yes_____ No_____

If you answered “No” to Question 5, please proceed to Question 6. If you answered “Yes” to Question 5, your deliberations are concluded.

6. Before April 24, 2022, could Plaintiffs or the Class discover, using reasonable diligence, AddShoppers collected, captured, or otherwise obtained their communications?³

Yes_____ No_____

Your deliberation are now complete. Please have the presiding juror date and sign this form and tell the Court that you have reached a verdict.

Date this _____ day of _____, 2025.

Presiding Juror

³ See *Siqueiros*, Question 2.